

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

HALLIBURTON ENERGY SERVICES, §  
INC., §  
          *Plaintiff*, §  
                          §  
                          §  
v. §  
                          § Civil Action No. 4:23-cv-01789  
GRANT PRIDECO, INC., REEDHYCALOG §  
UK, LTD., REEDHYCALOG, LP, NOV §  
INC., §  
          *Defendants*. §

**JOINT STIPULATION REGARDING DISCOVERY LIMITATIONS AND  
JOINT MOTION FOR ENTRY OF DISCOVERY ORDER**

Plaintiff Halliburton Energy Services (“Halliburton”) and Defendants Grant Pidco, Inc., ReedHycalog UK, Ltd., ReedHycalog LP, and NOV Inc. (“Defendants”) (Halliburton together with Defendants, the “Parties”) write to inform the Court that the Parties have resolved the outstanding disputes related to discovery limits previously identified in the Parties’ case management plan. Dkt. 29. The Parties stipulate and agree to the following previously disputed discovery limitations:

1. Each Party agrees with the limitations set forth in the attached E-Discovery Order, including the limitation that the parties be permitted to request up to five (5) e-mail custodians;
2. Each Party will be permitted to propound up to twenty-five (25) interrogatories as set forth in the Federal and Local Rules; and
3. Each Party will be permitted to take up to ten (10) total fact depositions absent stipulation by the Parties for additional depositions as permitted by the Federal Rules or leave of Court.

The Parties respectfully request that the Court enter the proposed order submitted herewith reflecting the Parties’ agreements.

Dated: September 28, 2023

*/s/ Gregg F. LoCascio*

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***Counsel for Plaintiff Halliburton  
Energy Services, Inc.***

Respectfully Submitted

*/s/ Harry P. Susman*

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***Counsel for Defendants Grant Prideco,  
Inc., ReedHycalog UK, Ltd., ReedHycalog,  
LP, NOV Inc..***

**CERTIFICATE OF SERVICE**

I certify that on September 28, 2023, in accordance with the Federal Rules of Civil Procedure, a true and correct copy of the above and foregoing document was served on all registered counsel of record via the Court's PACER/ECF system.

/s/ Gregg F. LoCascio

Gregg F. LoCascio, P.C.